

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

JOSEPH ROGERS, DEBRA JONES  
STEVENSON, FRANK GARRIDO, TAYLOR  
ARMIGER, and GWENDOLYN THOMPSON,  
on behalf of themselves and all others similarly  
situated,

Plaintiffs,

vs.

ASSURANCE IQ, LLC,

Defendant.

Case No. 2:21-cv-00823-JLR

**STIPULATED MOTION AND  
~~PROPOSED~~ ORDER TO EXTEND  
DEADLINES**

NOTE ON MOTION CALENDAR:  
December 9, 2021

Plaintiffs Joseph Rogers, Debra Jones Stevenson, Frank Garrido, Taylor Armiger, and Gwendolyn Thompson ("Plaintiffs") and Defendant Assurance IQ, LLC ("Defendant") (together with Plaintiffs, the "Parties") hereby jointly move the Court for an order extending certain class certification deadlines.

On September 24, 2021, the Court issued a Rule 16(b) and Rule 23(d)(2) Scheduling Order Regarding Class Certification Motion. Dkt. No. 20. On October 12, 2021, Kelsey Smith filed a motion seeking leave to amend her complaint to add four new individuals with similar claims against Defendant. Dkt. No. 26. After the filing of Kelsey Smith's motion, the Parties

1 agreed to stipulate to the filing of an amended complaint adding five new individuals making  
 2 similar claims against Defendant and removing Kelsey Smith as a plaintiff. On November 3,  
 3 2021, the Parties filed their stipulated motion for leave to amend, which this Court granted on  
 4 November 4, 2021. Dkt. Nos. 33, 34. Plaintiffs filed their amended complaint on November 4,  
 5 2021, and Defendant promptly answer on November 18, 2021. Dkt. Nos. 35, 36.

6 The Parties jointly request an extension of the class certification deadlines in order for  
 7 the Parties to investigate the new Plaintiffs' claims, conduct discovery, and develop their  
 8 positions on class certification, including the expert discovery necessary for that motion. The  
 9 Parties have met and conferred and seek modification of the class certification deadlines as  
 10 follows:

|  | <b>Initial Pretrial Scheduling<br/>Order (Dkt. No. 20)</b> | <b>Parties' Stipulated and<br/>Requested Modification</b> |
|--|--|---|
| <b>Deadline for Completion of<br/>Fact and Expert Discovery</b>  | November 12, 2021  | August 3, 2022  |
| <b>Deadline for Plaintiffs to<br/>File Motion for Class<br/>Certification (Briefing<br/>deadlines shall conform<br/>with Local Rule 7)</b> | December 14, 2021  | August 30, 2022   |

17 WHEREFORE, the Parties respectfully request an Order modifying the current class  
 18 certification deadlines as describe herein.  
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RESPECTFULLY SUBMITTED AND DATED this 9th day of December, 2021.

/s/ Samuel J. Strauss

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**ORDER**

IT IS SO ORDERED.

DATED this 9th day of December, 2021.

  
JAMES L. ROBART  
United States District Judge